## UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND

GOVERNMENT EMPLOYEES HEALTH ASSOCIATION, on behalf of itself and all other similarly situated,

Plaintiff,

Case No. 18-cv-3560-GLR

v.

ACTELION PHARMACEUTICALS LTD., et al.,

Defendants.

## JOINT STIPULATION PURSUANT TO AMENDED SCHEDULING ORDER

Pursuant to this Court's Amended Scheduling Order dated June 27, 2022 (ECF 155), Plaintiff Government Employees Health Association and Defendants Actelion Pharmaceuticals Ltd., Actelion Pharmaceuticals US, Inc., and Janssen Research & Development, LLC hereby submit the following:

- 1. On June 27, 2022, the Court entered the operative Scheduling Order ("the Scheduling Order") in this case. (ECF 155.)
- 2. Pursuant to the Scheduling Order, on July 1, 2022, the Parties "reach[ed] agreement as to outstanding ESI search term- and custodian-related issues."
- 3. The Scheduling Order requires that, within "one week after the resolution of search term and custodian related issues," the Parties shall "submit a proposed date for the substantial completion of document production."

- 4. The Parties have agreed upon a substantial completion deadline of July 20, except for those documents being produced pursuant to the Court's June 10 Order, (ECF 152), for which the Parties have agreed to a substantial completion deadline of August 5.
- 5. Accordingly, the Parties respectfully request that the Court enter the attached Proposed Amended Scheduling Order.

Dated: July 8, 2022 Respectfully submitted,

## /s/ Sharon K. Robertson

Sharon K. Robertson
Donna M. Evans
David O. Fisher
Aaron J. Marks
COHEN MILSTEIN SELLERS &
TOLL
88 Pine Street, 14th Floor
New York, NY 10005
Telephone: (212) 838-7797
Facsimile: (212) 838-7745
srobertson@cohenmilstein.com
devans@cohenmilstein.com
dfisher@cohenmilstein.com

Joseph M. Sellers COHEN MILSTEIN SELLERS & TOLL 1100 New York Avenue NW Ste 500 East Washington, DC 20005 Telephone: (202) 408-4600 jsellers@cohenmilstein.com

amarks@cohenmilstein.com

Thomas M. Sobol Hannah Schwarzschild Erin C. Burns Rachel A. Downey HAGENS BERMAN SOBOL SHAPIRO LLP

/s/ Shari Ross Lahlou
Shari Ross Lahlou (Bar. No. 16570)
Amisha Patel (pro hac vice)
DECHERT LLP
1900 K Street, NW
Washington, D.C. 20006-1110
shari.lahlou@dechert.com
amisha.patel@dechert.com

Julia Chapman (pro hac vice)
George Gordon (pro hac vice)
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
Phone: (215) 997-2060
Fax: (215) 997-2222
julia.chapman@dechert.com
george.gordon@dechert.com

Gregory T. Lawrence (Fed Bar No. 25670)
Michelle Noorani (Fed Bar No. 26438)
Christopher M. Finke (Fed. Bar No. 21788)
Liam E. Rhodes (Fed. Bar No. 21787)
LAWRENCE LAW, LLC
The Warehouse at Camden Yards
323 W. Camden Street, Suite 700
Baltimore, Maryland 21201
Phone: (410)-837-6995
greg@lawrencelawllc.com
michelle@lawrencelawllc.com

55 Cambridge Parkway Suite 301 Cambridge, MA 02142 Telephone: (617) 482-3700 Facsimile: (617) 482-3003 tom@hbsslaw.com hannahs@hbsslaw.com erinb@hbsslaw.com

racheld@hbsslaw.com

John D. Radice
A. Luke Smith
Natasha Fernández-Silber
RADICE LAW FIRM PC
475 Wall Street Princeton, NJ 08540
Telephone: (267) 570-3000
Facsimile: (609) 385-0745
jradice@radicelawfirm.com
lsmith@radicelawfirm.com
nsilber@radicelawfirm.com

Archana Tamoshunas TAUS, CEBULASH & LANDAU, LLP 80 Maiden Lane Ste 1204 New York, NY 10038 646-873-7651 atamoshunas@tcllaw.com

Counsel for Plaintiff

christopher@lawrencelawllc.com liam@lawrencelawllc.com

Counsel for Defendants

**CERTIFICATE OF SERVICE** 

I hereby certify that I caused a copy of the foregoing to be filed electronically via the

Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access these

filings, and notice of these filings will be sent to those parties by operation of the CM/ECF system.

Dated: July 8, 2022 /s/ Aaron J. Marks

Aaron J. Marks

4